

Proposed Stipulation IN THE SUPREME COURT OF THE STATE OF NEVADA

CASE NO. 70504

JAMES NALDER, GUARDIAN AD LITEM ON BEHALF OF CHEYANNE

NALDER; AND GARY LEWIS, INDIVIDUALLY

Appellants,

v.

UNITED AUTOMOBILE INSURANCE COMPANY,

Respondent,

Electronically Filed
Aug 17 2018 10:28 a.m.
Elizabeth A. Brown
Clerk of Supreme Court

**STIPULATION FOR EXTENSION OF TIME FOR RESPONDENT TO FILE
RESPONDENTS' SUPPLEMENTAL OPENING BRIEF REGARDING SECOND
CERTIFIED QUESTION OF LAW**

Appellants JAMES NALDER, GUARDIAN AD LITEM ON BEHALF OF CHEYANNE NALDER and GARY LEWIS, INDIVIDUALLY, and Respondent, UNITED AUTOMOBILE INSURANCE COMPANY, hereby stipulate to extend the time for Respondent to file their Supplemental Opening Brief Regarding Second Certified Question of Law from the United States Ninth Circuit Court of Appeals by ninety days (90) days up to and including December 4, 2018. Respondents Supplemental Opening Brief is currently due September 4, 2018.

Respondent has not previously sought any other extensions of time to file their Supplemental Opening Brief regarding Second Certified Question of Law and this Court has not denied any requests for extensions of time to file any pleading.

Dated this 16th day of August, 2018.

Dated this 16th day of August, 2018

EGLT PRINCE

/s/ Dennis M. Prince
DENNIS M. PRINCE, ESQ.
Nevada Bar No. 5092
KEVIN T. STRONG, ESQ.
Nevada Bar No. 12107
400 South Seventh Street, 4th Floor
Las Vegas, Nevada 89101
Attorneys for Appellants
James Nalder, Guardian ad Litem
on behalf of Cheyanne Nalder,
and Gary Lewis

ATKIN WINNER & SHERROD

/s/ Matthew Douglas
MATTHEW DOUGLAS, ESQ.
Nevada Bar No. 11371
1117 S. Rancho Drive
Las Vegas, Nevada 89102
Attorneys for Respondent
United Automobile Insurance
Company

CERTIFICATE OF SERVICE

I hereby certify that on August 16th, 2018, I electronically filed the foregoing **STIPULATION FOR EXTENSION OF TIME FOR RESPONDENTS TO FILE THEIR RESPONSE TO APPELLANT'S SUPPLEMENTAL OPENING BRIEF REGARDING SECOND CERTIFIED QUESTION OF LAW** with the Nevada Supreme Court on August 16, 2018 using the CM/ECF system.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished in accordance with the Master Service List.

Thomas E. Winner, Esq.
Matthew J. Douglas, Esq.
ATKIN WINNER & SHERROD
1117 South Rancho Drive
Las Vegas, Nevada 89102

Thomas Christensen, Esq.
**CHRISTENSEN LAW
OFFICES, LLC**
1000 S. Valley View Blvd.
Las Vegas, Nevada 89107
Attorney for Appellants

David T. Pursiano, Esq.
**PURSIANO BARRY
BRUCE LAVELLE, LLP**
8551 S. Rampart Blvd., #260
Las Vegas, NV 89145
*Attorney for Amicus Curiae
United Policyholders*

Thomas E. Scott, Esq.
Scott A. Cole, Esq.
COLE, SCOTT & KISSANE, P.A.
9150 South Dadeland Boulevard #140
Miami, Florida 33156
Attorneys for Respondent

Matthew L. Sharp
MATTHEW L. SHARP, LTD
432 Ridge Street
Reno, NV 89501
*Attorney for Amicus Curiae
Nevada Justice Association*

Mark A. Boyle, Esq.
BOYLE & LENOARD, P.A.
2050 McGregor Blvd.
Fort Myers, FL 33901
*Attorney for Amicus Curiae
United Policyholders*

Daniel F. Polsenberg, Esq.
Joel D. Henriod, Esq.
**LEWIS ROCA ROTHBERGER
CHRISTIE, LLP**
3993 Howard Hughes Pkwy., #600
Las Vegas, NV 89169
*Attorneys for Amici Curiae Complex
Insurance Claims Litigation
Association, American Insurance
Association, and Property Casualty
Insurers Association of America*

Laura A. Foggan, Esq
CROWELL AND MORING, LLP
1001 Pennsylvania Avenue, N.W.
Washington, DC 20004
*Attorneys for Amici Curiae Complex
Insurance Claims Litigation
Association, American Insurance
Association, and Property Casualty
Insurers Association of America*

/s/ Victoria Hall
An employee of ATKIN Winner & Sherrod